

Message

From: Dickens, Brian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=416CD582A67D44AAB91D3BEFF56B892D-BDICKENS]
Sent: 6/14/2018 8:41:14 PM
To: James.Kavalec@epa.ohio.gov
CC: Breneman, Sara [breneman.sara@epa.gov]; Harrison, Gina [harrison.gina@epa.gov]; St. Peter, Marie [StPeter.Marie@epa.gov]
Subject: AK Steel

Jim:

We were planning to send an NOV to AK Steel for the following violations:

OAC rule 3745-17-07(B)(2)(b) limits VEs from "offtake piping." No more than 10% of offtake piping should be leaking at any time.

OAC rule 3745-17-07(B)(2)(d)(ii) limits VEs from ovens. No more than 10% of ovens should be leaking at any time.

OAC rule 3745-17-07(B)(2)(a) limits VEs from charging. VEs from charging shall not exceed 125 seconds during any 5 consecutive charges.

I think your NOV only contained the second rule.

We would seek to require that AK ensure compliance with the charging limit and the 10% rule for offtake piping, similar to your order's requirement that AK comply with the 10% rule for oven door leaks. Do you want to expand your case to include these, or want us to send our NOV?

(please copy Sara on your reply)

Thanks

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